

FILED

2025 APR -8 PM 12: 35

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

Kelly Brooke Martin,)
)
Plaintiff,)
v.) Civil Action
) Case No. 3:24-cv-00075-KAC-JEM
University of Tennessee,)
)
Defendant.)

PLAINTIFF PRETRIAL DISCLOSURES

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure and the Scheduling Order entered in this matter, Plaintiff Kelly Brooke Martin hereby submits the following pretrial disclosures:

I. Final Witness List

1. Dr. Kelly Martin, Plaintiff
2. Dr. Gary Namie
3. Dr. Lori Messinger, UTCSW
4. Dr. Javonda Williams Moss, UTCSW
5. Dr. Camille Hall
6. Dr. Robert Mindrup, UTCSW
7. Ann Ryan, UTCSW
8. Tiffany Harmon, UTCSW
9. Ashley Hiatt, UTCSW
10. Tony Murchison, UTCSW
11. Julie Roe, University of Tennessee
12. Jon Chandler, University of Tennessee
13. Dr. Stan Bowie, UTCSW
14. Dr. Patricia Bamwine, UTCSW
15. Jill Malolepszy, University of Tennessee
16. Dr. Katrice Morgan, University of Tennessee

17. Rachel Dey, University of Tennessee
18. Dr. Anne Conway, UTCSW
19. Kim Denton, UTCSW
20. Dr. Andrea Joseph McCatty, UTCSW
21. Dr. Robert Mindrup, UTCSW
22. Natalie Crippen, UTCSW

II. Deposition Designations

1. Full deposition of Dr. Kelly Martin (October 22, 2024 and January 22, 2025)
2. Full deposition of Dr. Gary Namie (January 22, 2025)
3. Full deposition of Dr. Camille Hall (February 28, 2025)

III. Exhibit List

1. Social Security Administration Notice of Disability Decision – Fully Favorable
2. Medical Records confirming Plaintiff Diagnosis
3. Plaintiff's responses to the Defendant's interrogatories, detailing the names of individuals aware of denied accommodation requests; specific acts of harassment, including derogatory comments and exclusionary behavior; retaliatory actions, including intimidation and workplace ostracization; failure to address the Plaintiff's complaints properly or engage in the interactive process
4. Records confirming accommodation requests
5. Email communications (various dates)
6. Letter from the University's Human Resources Department (January 11, 2022), confirming receipt of Plaintiff's harassment and discrimination complaint
7. Plaintiff's administrative leave notices (March 14, 2022, and September 5, 2022), indicating retaliatory actions
8. Termination letter (September 26, 2022), demonstrating pretextual reasons for dismissal
9. EEOC Charge of Discrimination (May 17, 2023) and EEOC Notice of Right to Sue (November 29, 2023)
10. EEOC Charge Files
11. Dr. Camille Hall Deposition

12. Dr. Gary Naime Deposition
13. Dr. Kelly Martin Deposition
14. Video Recordings of meetings with Messinger, Williams-Moss, Human Resources, and the Office of Equity and Diversity (various dates)
15. Text Messages
16. Committee for Equity and Inclusion Meeting Notes
17. Student Course Evaluations
18. University of Tennessee Faculty Handbook
19. OIR Investigation Report
20. University of Tennessee EEOC Position Statement
21. University of Tennessee Harassment Policy
22. University of Tennessee Equal Opportunity Policy
23. “What’s it like to be a Little Person?” Publicly Disseminated UTCSW Facebook Live Event about Plaintiff’s Genetic Condition
24. UTCSW publicly disseminated advertisements for “What’s it like to be a Little Person”
25. Plaintiff HR File
26. Plaintiff Annual Performance Reviews
27. Dr. Lori Messinger Meeting Notes for March 14, 2022 (created March 15, 2022)
28. OED Meeting Notes
29. University of Tennessee Bullying Policy
30. University of Tennessee Code of Conduct Policy
31. UTCSW Salary Data
32. Plaintiff CSWE recognition as scholar in global and intercultural competence (March 2022)

IV. Damages

Category	Amount
Compensatory & Punitive Damages (3 violations × \$300,000 each)	\$900,000
Professoriate Back Pay	\$105,000

Category	Amount
Professoriate Front Pay	\$150,000
Director Back Pay	\$122,500
Director Front Pay	\$175,000
Liquidated Damages (Emotional Distress, Career Loss, etc.)	\$3,000,000
Total Economic & Liquidated Damages	\$4,452,500
Equitable & Injunctive Relief	(Non-monetary)
Associated Fees & Costs	(To be determined)

The Plaintiff also seeks:

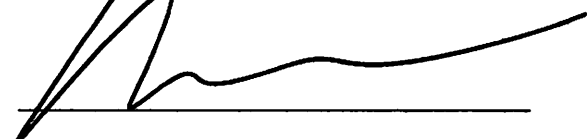
Reinstatement of all employment and retirement benefits.

Removal of adverse personnel records.

Restoration of the Plaintiff's name and professional reputation.

A formal written apology from the Defendant.

Respectfully submitted this 7th day of April, 2025.



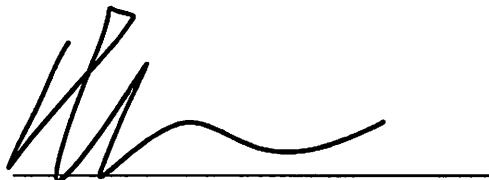
Dr. Kelly Brooke Martin, Plaintiff, pro se

CERTIFICATE OF SERVICE

I hereby certify that on April 7th, 2025, I provided a true and correct copy of the foregoing response via electronic mail to:

1. Harold.Pinkley@tennessee.edu
2. Dgarner2@utk.edu

On this 7th day of April, 2025.

A handwritten signature in black ink, appearing to read 'Kelly Martin', is written over a horizontal line.

Dr. Kelly Brooke Martin, Plaintiff, pro se

803 W 1st Avenue

Lenoir City, TN 37917-2717

Kmarti16utk@gmail.com

865.898.4965